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Federal Communications Commission
45 L Street NE
Washington, DC 20554

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Attn: The Secretary

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From:
Tim Radford
WKRK Radio
129 Stonebrook Drive
Murphy, NC 28906

To:
Federal Communications Commission
The Secretary
45 L Street NE
Washington, DC 20554

Dear Secretary,

For the past 30 years, I've owned a small radio station (WKRK in Murphy, NC) that does a great job serving our local community. I accept that AM radio is a dying technology and that the current model needs to change. The FM translator we were assigned doesn't cover as large of an area as the AM station covers. If that changed, there would be little need to run both the AM and FM feeds.

Below are my thoughts on modernization and helping small broadcasters like mine survive.

Argument for FCC Policy Change: Transitioning AM Stations to Full-Coverage FM Translators

The current FCC regulations requiring 100% simulcast of AM programming on FM translators, while well-intentioned, are becoming increasingly unsustainable and counterproductive for small-market AM radio stations. I propose a policy change that would allow AM stations to discontinue their AM broadcasts and upgrade their FM translator coverage to match their existing AM footprint. This transition offers significant benefits for broadcasters, listeners, and the broader spectrum landscape.

Economic Sustainability for AM Stations:

- **Reduced Operational Costs:** Maintaining high-power AM transmitters is expensive, particularly for stations like mine, which operate at 5,000 watts. Eliminating the AM broadcast would drastically reduce power consumption, leading to substantial cost savings over time.
- **Asset Liquidation:** AM transmission requires extensive land for ground radials and tower placement. Allowing stations to decommission their AM infrastructure would enable station owners to sell these properties, generating revenue and reducing maintenance burdens such as painting and lighting of tall radio towers. Having fewer AM towers around the country leads to safer flights for pilots.
- **Shared Infrastructure:** FM transmission allows for the use of shared towers, further reducing costs and environmental impact.

Enhanced Listener Experience:

- **Improved Audio Quality:** FM offers significantly higher fidelity audio compared to AM, providing a superior listening experience.

- **Increased Reliability:** FM signals are less susceptible to interference and atmospheric noise, ensuring a more consistent and reliable broadcast. Most AM stations have to reduce power output after sunset which leads to more equipment to maintain.
- **Future-Proofing Radio:** Car manufacturers are increasingly phasing out AM radios. Transitioning to full-coverage FM ensures that local radio content remains accessible to future generations of listeners. Western North Carolina is still recovering from Hurricane Helene and for many, radio was the only way people could receive important life-saving information and instruction.

Spectrum Efficiency and Public Interest:

- **Spectrum Repurposing:** The AM band, which is increasingly underutilized, could be repurposed for other valuable services, such as broadband or public safety communications.
- **Reduced Interference:** Eliminating high-power AM transmissions would reduce potential interference with other electronic devices.
- **Modernization of Radio:** This policy change would modernize the radio landscape, aligning it with evolving technology and consumer preferences.

Addressing the Car Manufacturer Issue:

- The biggest concern that AM broadcasters have is the removal of AM radio from new vehicles. If the FCC allows AM stations to move to full coverage FM, then local stations would remain on the car dashboard on FM. This creates a win-win for everyone.

Conclusion:

The proposed policy change is a pragmatic and forward-thinking solution that addresses the challenges facing AM radio stations while enhancing the listening experience and optimizing spectrum usage. It would allow small stations like mine to remain viable, provide a better service to our listeners, and contribute to a more efficient and modern radio landscape. I urge the FCC to consider this proposal and take action to ensure the future of local radio.

Thank you for taking the time to hear my concerns.

Sincerely,

Tim Radford

Tim Radford
Mayor, Town of Murphy, NC
Owner, WKRK Radio, Murphy, NC